Department of Energy
Richland Operations Office
P.O. Box 550
Richland, Washington 99352

SEP 23 1996

Mr. Steve M. Alexander
Perimeter Areas Section Manager
Nuclear Waste Program
State of Washington
Department of Ecology
1315 W. Fourth Avenue
Kennewick, Washington 99336-6018

Dear Mr. Alexander:

RESPONSE TO STATE OF WASHINGTON DEPARTMENT OF ECOLOGY'S (ECOLOGY) LETTER REGARDING THE REGULATORY STATUS RELATED TO 202-S AND 233-S BUILDINGS

This letter is in response to your letter to Ms. Linda K. McClain, "Regulatory Status Related to 202-S and 233-S Buildings," dated July 29, 1996, in which the State of Washington Department of Ecology (Ecology) shows interest in the regulatory status of the 202-S REDOX Facility and the 233-S Plutonium Concentration Facility. The U.S. Department of Energy, Richland Operations Office (RL), briefly addressed the status of the 202-S REDOX Facility and the 233-S Plutonium Concentration Facility in a July 22, 1996, meeting with Ecology and the U.S. Environmental Protection Agency (EPA). All parties wish to meet in the near future to discuss plans for continual management of these facilities in a safe and efficient manner. The following paragraphs are intended to provide clarification regarding such future plans.

As indicated in the referenced letter, both facilities are being addressed under Section 8.9 of the Hanford Federal Facility Agreement and Consent Order Action Plan (Tri-Party Agreement). The 202-S REDOX Facility, which is in the surveillance and maintenance (S&M) phase, is one of the facilities categorized by the Tri-Party Agreement as "S&M Surplus Facilities." The 233-S Facility is proposed for near-term facility disposition under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) in full coordination with Ecology and EPA. In furtherance of these activities, RL is in the process of developing two Tri-Party Agreement documents: 1) a S&M plan for the S&M Surplus Facilities, which includes the 202-S REDOX Facility; and 2) an Engineering Evaluation/Cost Analysis (EE/CA) for disposition of 233-S. The proposed content of both documents are summarized below.

S&M Plan for S&M Surplus Facilities

The Tri-Party Agreement recognizes (in Section 8.9) that certain Hanford Site facilities will not follow the entire transition-to-disposition process outlined in Section 8 of the Tri-Party Agreement. Specifically, Section 8.9.1 determines that the facilities transferred to the S&M phase prior to the existence of transition projects (the "S&M Surplus Facilities") shall continue to be managed in accordance with EM-40 Guidance Documents, using existing S&M procedures to control day to day activities. Section 8.9 further provides

that an S&M Plan shall be prepared to describe the overall management of the S&M Surplus Facilities until disposition phase activities commence. It does not, however, require a Preclosure Work Plan or transition End Point Criteria document to be developed or approved for any of the S&M Surplus Facilities. These requirements only apply to the facilities that go through transition under Sections 8.4 and 8.5; not to the S&M Surplus Facilities addressed separately in Section 8.9.

RL is currently developing a comprehensive S&M Plan for the S&M Surplus Facilities to address the requirements of Section 8 of the Tri-Party Agreement and to demonstrate compliance with relevant and appropriate regulatory requirements. The S&M Plan will identify the hazards to human health and the environment presented by the S&M Surplus Facilities (except those facilities which are implementing, or planning to implement in the near future, the final disposition phase of decommissioning). The S&M Plan will include a summary of deactivation/shutdown efforts previously conducted at these facilities. For the 202-S REDOX Facility, this summary will be based on the "Deactivation of REDOX" (Isochem 1968) and "Decontamination of Obsolete Processing Facilities at Hanford," ARH-SA-183, Atlantic Richfield Hanford Company, June 1974. Copies of these documents have been submitted to Ecology, and will be included in the administrative record file to support public review of the S&M Plan. Uncertainties with regard to the materials that may be contained within the S&M Surplus Facilities, and related potential risks that may be posed by such materials, will be identified and evaluated in the S&M Plan.

The S&M Plan will encompass all aspects of a CERCLA removal action evaluation document (EE/CA) and will be submitted to Ecology and EPA for review and approval prior to submittal for public review. The plan will identify and address the substantive requirements, including those in the Resource Conservation and Recovery Act (RCRA), that are applicable or relevant and appropriate to proposed S&M alternatives. Thus, the S&M Plan will be the vehicle to concurrently fulfill and demonstrate coordination of CERCLA and RCRA requirements under the Tri-Party Agreement for the S&M phase.

Expected duration of S&M for the inactive surplus facilities, including 202-S REDOX, will be included in the S&M Plan, consistent with the multi-year work plan for the Decontamination and Decommissioning Project.

EE/CA for the Disposition Phase of 233-S

As has been communicated previously, the 233-S Facility is proposed to undergo final disposition beginning in FY 1997. An EE/CA is currently being prepared to allow selection of an appropriate alternative for the disposition phase. The EE/CA will identify known hazards presented by the facility, summarize deactivation previously performed at 233-S, and identify the regulatory requirements that are applicable or relevant and appropriate to the response alternatives. A preliminary draft of the EE/CA was provided informally to Ecology as part of the Environmental Restoration Initiative meetings held August 20-22, 1996. A proposed schedule for disposition of 233-S will be added to the EE/CA.

Kennewick

Uncertainties regarding the nature or extent of hazardous substances at 233-S will be identified in the EE/CA. Any actions needed to further characterize the condition of the facility prior to implementation of a response action will be specified in the Remedial Design Report documentation. This documentation will be provided to EPA and Ecology after selection of a response alternative based on the EE/CA, and prior to commencement of the selected action.

Your letter also requested information on the Multi-Year Work Plan and all performance based initiatives on 202-S and/or 233-S. As you are aware, the Multi-Year Work Plan reviews occurred August 20-22, 1996. All comments received from Ecology and EPA have been addressed. The performance based initiatives for the next performance period (October 1996 through March 1997) are in the process of being established. Copies of all initiatives will be provided as soon as they are established.

RL is looking forward to meeting with Ecology and EPA to discuss future plans for 202-S and 233-S. If you require additional information regarding this letter, please contact me on 376-7121.

Sincerely,

Jeffrey M. Bruggeman, Project Manager
Decontamination and Decommissioning Project

cc: A. D. Huckaby, Ecology
P. S. Innis, EPA
J. E. Rugg, BHI
S. D. Thoren, BHI